

LAW OFFICES
BLOOSTON, MORDKOFKY, DICKENS, DUFFY & PRENDERGAST
2120 L STREET, NW
WASHINGTON, DC 20037

HAROLD MORDKOFKY
BENJAMIN H. DICKENS, JR.
JOHN A. PRENDERGAST
GERARD J. DUFFY
RICHARD D. RUBINO
MARY J. SISAK
D. CARY MITCHELL
KATHLEEN A. KAERCHER
MICHAEL B. ADAMS, JR.
DOUGLAS W. EVERETTE

ARTHUR BLOOSTON
1914 - 1999

(202) 659-0830
FACSIMILE: (202) 828-5568

April 16, 2001

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES
BUENOS AIRES, ARGENTINA

ROBERT M. JACKSON
OF COUNSEL

PERRY W. WOOFER
LEGISLATIVE CONSULTANT

EUGENE MALISZEWSKYJ
DIRECTOR OF ENGINEERING
PRIVATE RADIO

WRITER'S CONTACT INFORMATION

202-828-5540
jap@bmjd.com

By Hand Delivery

Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, NW, Room TW-A325
Washington, D.C. 20554

**Re: Brookings Municipal Utilities d/b/a Swiftel Communications
First Quarterly TTY Implementation Report
CC Docket No. 94-102**

Dear Ms. Salas:

On behalf of Brookings Municipal Utilities d/b/a Swiftel Communications ("Brookings") and pursuant to the directive contained in the Commission's *Fourth Report and Order* in CC Docket No. 94-102, FCC 00-436 (*rel.* December 14, 2000), we are transmitting herewith the original and four copies of its "First Quarterly Report" concerning TTY digital deployment.

Please refer any inquiries or correspondence in connection with this matter to our offices.

Very truly yours,



John A. Prendergast
Counsel to Brookings Municipal Utilities

Attachment

cc (w/att): Kris Moneith
Pam Gregory
Mindy Littell

**Brookings Municipal Utilities
d/b/a Swiftel Communications
415 Fourth Street
Brookings, SD 57006**

April 12, 2001

Ms. Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

***Re: First Quarterly TTY Implementation Report / CC Docket No. 94-102
Broadband PCS Stations WPOI260 and WPQL803
MTA12 A2 – Minneapolis, St. Paul, MN
MTA32 B2 – Des Moines-Quad Cities, IA***

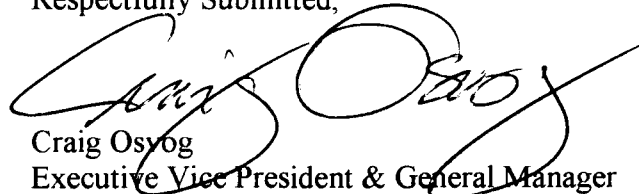
Dear Ms. Salas:

Brookings Municipal Utilities d/b/a Swiftel Communications ("Brookings") hereby submits its first quarterly report on implementation of TTY access to 9-1-1 over its digital wireless network, pursuant to the Commission's *Fourth Report and Order* in CC Docket No. 94-102, released December 14, 2000.

Brookings is operating the above-listed broadband PCS systems pursuant to an affiliation arrangement with Sprint PCS. Therefore, Brookings is planning to abide by the TTY technical standards and solutions used by Sprint PCS. Additional information about TTY access on the Sprint PCS network is contained in Attachment A, hereto.

Brookings will make every effort to implement TTY capability in its markets by the June 30, 2002 deadline.

Respectfully Submitted,


Craig Osyog
Executive Vice President & General Manager

Att.

Sprint PCS Report to the FCC
Provided by Cheryl Gentry
3/27/01

1. ***Network Infrastructure Software Development***
 - Lack of availability of bug-free software has delayed our ability to begin interoperability testing. This is resulting in a significant delay in our initial rollout projections. In our previous report we stated that we expected software delivery from our vendors first and second quarter this year.
 - Two of our infrastructure vendors have provided software to our labs; however, several significant bugs have been identified, inhibiting our ability to begin lab and field testing in the planned time frames. (Specifically, we are concerned with the time it will take for network vendors to add the bug fixes in Lucent's changes to the standard).
 - The other two infrastructure vendors have committed to providing software to our labs by late summer or early fall.
 - We are looking to the FCC to hold infrastructure software manufacturers accountable if we are going to be held to the drop-dead date of 6/02.
2. ***Handset development and testing plans***
 - TTY compatibility is dependent on Qualcomm's commercial release of their DMSS software (reference software integrated into their handset) - scheduled for late April 2001, at the earliest.
 - Following that release, handset manufacturers need to build user interface (software).
 - Interoperability testing w/ infrastructure will follow - both at SPCS and in infrastructure labs.
 - We are dependent on handset vendors to provide TTY capable handsets prior to field-testing.
 - SPCS is anxious for the report from the TTY sub-committee regarding the solution to impedance issues related to the audio interface through the 2.5-mm jack.
 - We are looking to the FCC to hold handset manufacturers accountable if we are going to be held to the drop-dead date of 6/02.
3. ***Beta testing and lab testing***
 - SPCS requires both lab- and field-testing prior to implementation.
 - Our internal lab-testing and field-testing are extremely intensive and require approximately two to three months each.
 - We had planned to begin FMA testing in May or June, now we are looking at late summer or early fall, which may be optimistic.
 - We are planning to test with consumers in various markets prior to nation-wide deployment.
4. ***Release and general availability to carriers of network software***
 - We continue to experience frustration with the inability to obtain bug-free software in order to begin interoperability testing.
5. ***Availability to carriers of full acceptance units***
 - See # 2
6. ***Efforts toward Achieving digital wireless solution compatibility with enhanced TTY devices.***
 - In regards to any requirement to support enhanced protocols - We emphasize that this is beyond our technical capability for this launch, a requirement to do so would take an additional 2 years of development.
7. ***Carrier Coordination with testing with PSAP***
 - PSAP testing will be conducted at the time of Beta trials.
8. ***Carrier testing activities, including field testing, consumer end-to-end testing***
 - As stated previously, SPCS requires both lab and field-testing prior to implementation.
 - The internal lab-testing and field-testing processes are intensive, requiring approximately two to three months each.
 - As a result, FMA testing has been delayed until at least late summer, or early fall.
9. ***Retail availability of necessary consumer equipment***
 - TTY capable handset sales are projected for first quarter, 2002.
10. ***Geographic scope of network deployment***
 - SPCS plans to launch in specific markets in 2002, with nation-wide launch completed by June 2002.